

Exhibit K



1 GALATI - ROUGH TRANSCRIPT

2 ROUGH DRAFT

3 DEPOSITION OF THOMAS GALATI TAKEN ON

4 5/24/23

5 UNCERTIFIED TRANSCRIPT DISCLAIMER IN THE

6 MATTER OF

7 NYC POLICING

8 The following transcript of proceedings,

9 or any portion thereof, in the

10 above-titled matter is being delivered

11 UNEDITED and UNCERTIFIED by the court

12 reporter.

13

14 This is an unofficial transcript, which

15 should NOT be relied upon for purposes of

16 verbatim citation of testimony.

17

18 This transcript has not been checked,

19 proofread or corrected. It is a draft

20 transcript, NOT a certified transcript,

21 and as such it may contain

22 computer-generated mistranslations of

23 stenotype code or electronic transmission

24 errors, resulting in inaccurate or
25 nonsensical word combinations, or

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1 GALATI - ROUGH TRANSCRIPT
2 untranslated stenotype symbols which
3 cannot be deciphered by non-stenotypists.
4 Corrections will be made in the
5 preparation of the certified transcript,
6 resulting in differences in content, page
7 and line numbers, punctuation and
8 formatting.

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1 GALATI - ROUGH TRANSCRIPT

2 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

3 Case No. 20-cv-8924 (CM)(GWG)

-----x

4 This proceeding is related to:
Case No. 21-cv-00533 (CM)((GWG)

5

6 In re: New York City Policing During
Summer Demonstrations,

7 ADAMA SOW, DAVID JAKLEVIC, ALEXANDRA DE
MUCHA PINO, OSCAR RIOS, BARBARA ROSS,
8 MATTHEW BREDDER, SABRINA ZURKUHLLEN, MARIA
SALAZAR, DARA PLUCHINO, and SAVITRI
9 DURKEE, on behalf of themselves and othes
similarly situated,

10 Plaintiffs,
against

11 CITY OF NEW YORK; MAYOR BILL DE BLASIO;
NEW YORK CITY POLICE DEPARTMENT
12 COMMISSIONER DERMOT SHEA; NEW YORK CITY
POLICE DEPARTMENT CHIEF OF DEPARTMENT
13 TERENCE MONAHAN; NYPD DETECTIVE EDWARD
CARRASCO (SHIELD NO. 1567); NYPD OFFICER
14 TALHA AHMAD (SHIELD NO. 21358); NYPD
OFFICER KEVIN AGRO (SHIELD NO. 8054); and
15 NYPD OFFICERS JOHN and JANE DOES #1 - 40,
Defendants.

16 -----x

17 May 24, 2023
9:40 a.m.

18 Remote video-teleconference

19 deposition via Zoom of CHIEF THOMAS

20 GALATI, pursuant to notice, before Jineen
21 Pavesi, a Registered Professional
22 Reporter, Registered Merit Reporter,
23 Certified Realtime Reporter and Notary
24 Public of the State of New York.
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1 GALATI - ROUGH TRANSCRIPT
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK
4 Case No. 20-cv-8924 (CM)(GWG)
5 -----x
6 In re: New York City Policing during
7 Summer 2020 Demonstrations
8 _____
9 This filing is related to:
10 ALL CASES
11 -----x

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1 GALATI - ROUGH TRANSCRIPT

2 A P P E A R A N C E S :

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1 GALATI - ROUGH TRANSCRIPT

2 A P P E A R A N C E S (Continued):

3 NYC LAW DEPARTMENT

4 CORPORATION COUNSEL OF THE CITY OF NEW

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7 New York, New York 10007

8 Attorneys for Defendants DeBlasio,

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14 NEW YORK POLICE DEPARTMENT

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17 Attorneys for Defendants

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2 S T I P U L A T I O N S

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4 IT IS HEREBY STIPULATED AND AGREED by

5 and between the Attorneys for the

6 respective parties hereto that filing and

7 sealing be and the same are hereby waived.

8 IT IS FURTHER STIPULATED AND AGREED

9 that all objections except as to the form

10 of the question, shall be reserved to the

11 time of the trial.

12 IT IS FURTHER STIPULATED AND AGREED
13 that the within examination may be signed
14 and sworn to before any notary public with
15 the same force and effect as though signed
16 and sworn to before this Court.

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2 THOMAS GALATI,

3 having been first duly sworn remotely upon

4 agreement of all counsel, as hereinafter

5 certified, was examined and testified as

6 follows:

7 EXAMINATION BY

8 MS. PRAKASH:

9 Q. Good morning, chief, how are

10 this morning?

11 A. Well.

12 MS. PRAKASH: Before we get
13 started, let me note for the record that
14 this deposition is being recorded
15 stenographically by the court reporter and
16 by audio visual means through the video
17 conference software Zoom.

18 My name is Swati Prakash, I am
19 an assistant Attorney General in the Civil
20 Rights Bureau with the New York State
21 Office of the Attorney General and I
22 represent plaintiffs in these consolidated
23 litigation People of the State of New
24 York.

25 Why don't we get started with

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2 if you could just state your name and your
3 business address.

4 A. My name is Thomas Galati.

5 My business address, meaning my
6 NYPD business address?

7 Q. Are you currently employed by

11 MS. ROBINSON: Objection.

12 You can answer.

13 A. I believe it's probably in some
14 reports that we've had.

15 Q. Reports meaning after a protest
16 or are you referring back to some of the
17 intel reports, like the situation
18 awareness?

19 A. I think reports that, you know,
20 at the end of a protest or during a
21 protest that, you know, somebody observed
22 them getting to black bloc mode, as I
23 said.

24 MS. PRAKASH: I am going to
25 call for the production of any documents

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2 pertaining to black bloc that have not yet
3 been produced, Amy, and I can put this in
4 writing following this deposition.

5 Q. One clarifying question; when I
6 was asking about the deputy commissioner
7 for counterterrorism and intelligence and
8 role that you played and the role that he

9 played, can you just explain or tell me
10 about who was interacting with the office
11 of the mayor, if either of you, and in
12 what capacity.

13 A. I can't speak for John Miller.

14 I just know that I was not
15 interacting with the mayor's office.

16 Q. And does the role of deputy
17 commissioner for counterterrorism and
18 intelligence include interactions with the
19 mayor's office?

20 A. I mean, that's, you know, based
21 on the subject what it was.

22 I've been dealing with the
23 mayor's office when I was in the police
24 department on issues related to that they
25 wanted information from me, you know,

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2 related to my bureau, but, you know, for
3 the most part we don't deal with the
4 mayor's office, that's up to the police
5 commissioner to deal with the mayor's
6 office.

7 Q. By we, you're referring to
8 intel and --

9 A. I can't speak for DCPI, but I
10 would say in general, from the police
11 department, communications from the
12 mayor's office go through the police
13 commissioner.

14 Q. Thank you.

15 And you did note that you were
16 doing the operational decisions, the
17 deputy commissioner was not involved in
18 terms of operational -- operations of the
19 intel bureau.

20 Are there any categories of
21 decisions concerning NYPD's use of
22 intelligence that the deputy commissioner
23 was involved with during the protest
24 period, that you were not, I should say?

25 A. That I was not, no, no, no.

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2 Q. Okay.

3 A. I think no.

4 Q. Are you familiar with a